UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JANE DOE,)
Plaintiff,)))
v.) Civil Action No. 2:20-cv-5142
NORTH PENN SCHOOL DISTRICT,)
Defendant.))

PLAINTIFF JANE DOE'S MOTION FOR PARTIAL SUMMARY JUDGMENT

Pursuant to Rule 56 of the Federal Rules of Civil Procedure, Plaintiff Jane Doe respectfully moves this Court to enter summary judgment in her favor, and against Defendant North Penn School District, on several elements of her Title IX claims: a "post-report" claim alleging that Jane experienced a hostile education environment because of the District's deliberate indifference to reports that she had been sexually assaulted by a classmate (Count I), and a "pre-assault" claim alleging that the District could have prevented Jane from suffering additional sexual assaults by the same classmate if not for the District's deliberate indifference to his known history of sexual harassment (Count II).

Specifically, Plaintiff seeks summary judgment on two elements of her "post-report" Title IX claim: (1) that Jane was sexually harassed at school by a sixth-grade classmate and (2) that District employees with authority to take corrective action had "actual notice" of the harassment. In addition, Plaintiff seeks summary judgment on one element of her "pre-assault" Title IX claim: that the District had "actual notice" that the classmate in question posed a substantial risk of

sexually harassing students before the District received reports that he had sexually assaulted Jane again in high school.

The grounds for Plaintiff's Motion are set forth in her accompanying Memorandum.

Date: March 31, 2022 Respectfully submitted,

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*Admitted *Pro Hac Vice*† Application to the D.C. Bar pending;
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CERTIFICATE OF SERVICE

I hereby certify that on March 31, 2022, I filed the foregoing Plaintiff Jane Doe's Motion for Partial Summary Judgment, accompanying memorandum, and exhibits using the CM/ECF system, which will send electronic notice of this filing to Defendant's counsel of record.

s/ Laura E. Laughlin

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